

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

JEFFREY FRANZ, et al,

Plaintiffs,

Hon. Mark A. Goldsmith

v

No. 21-12871

OXFORD COMMUNITY SCHOOLS,  
TIMOTHY THRONE, STEVEN WOLF,  
RYAN MOORE, COUNSELOR #1,  
COUNSELOR #2, STAFF MEMBER,  
TEACHER #1 and TEACHER #2,

Defendants.

---

GEOFFREY N. FIEGER (P30441)  
JAMES J. HARRINGTON (P65351)  
ROBERT G. KAMENEC (P35283)  
NORA Y. HANNA (P80067)  
MILICA FILIPOVIC (P80189)  
*Fieger, Fieger, Kenney & Harrington, P.C.*  
Attorneys for Plaintiffs  
19390 West Ten Mile Road  
Southfield, MI 48075  
(248) 355-5555  
[g.fieger@fiegerlaw.com](mailto:g.fieger@fiegerlaw.com)  
[j.harrington@fiegerlaw.com](mailto:j.harrington@fiegerlaw.com)  
[r.kamenec@fiegerlaw.com](mailto:r.kamenec@fiegerlaw.com)  
[n.hanna@fiegerlaw.com](mailto:n.hanna@fiegerlaw.com)  
[m.filipovic@fiegerlaw.com](mailto:m.filipovic@fiegerlaw.com)

TIMOTHY J. MULLINS (P28021)  
KENNETH B. CHAPIE (P66148)  
JOHN L. MILLER (P71913)  
ANNABEL F. SHEA (P83750)  
*Giarmarco, Mullins & Horton, P.C.*  
Attorneys for Defendants, Oxford  
Community Schools, Timothy Throne,  
Steven Wolf and Ryan Moore  
101 W. Big Beaver Road, 10th Floor  
Troy, MI 48084-5280  
(248) 457-7020  
[tmullins@gmhlaw.com](mailto:tmullins@gmhlaw.com)  
[kchapie@gmhlaw.com](mailto:kchapie@gmhlaw.com)  
[jmiller@gmhlaw.com](mailto:jmiller@gmhlaw.com)  
[ashea@gmhlaw.com](mailto:ashea@gmhlaw.com)

**NOTICE OF NON-PARTY FAULT**

Defendants, OXFORD COMMUNITY SCHOOLS, TIMOTHY THRONE,  
STEVEN WOLF and RYAN MOORE, by and through their attorneys,

GIARMARCO, MULLINS & HORTON, P.C., and pursuant to MCR 2.112 (K), hereby file a Notice of Non-Party Fault as to the following:

1. Ethan Crumbley
2. James Crumbley
3. Jennifer Crumbley

for the reason that Defendants contend that the conduct complained of by Plaintiffs was proximately caused by said individuals.

/s/TIMOTHY J. MULLINS

GIARMARCO, MULLINS & HORTON, PC  
Attorney for Defendants Oxford Community  
Schools, Timothy Throne, Steven Wolf and Ryan  
Moore

DATED: January 21, 2022

**CERTIFICATE OF ELECTRONIC SERVICE**

TIMOTHY J. MULLINS states that on January 21, 2022, he did serve a copy of the **Notice of Non-Party Fault** via the United States District Court electronic transmission.

/s/TIMOTHY J. MULLINS

GIARMARCO, MULLINS & HORTON, PC  
Attorney for Defendants Oxford Community  
Schools, Timothy Throne, Steven Wolf and Ryan  
Moore

101 W. Big Beaver Road, 10<sup>th</sup> Floor

Troy, MI 48084-5280

(248) 457-7020

[tmullins@gmhlaw.com](mailto:tmullins@gmhlaw.com)

P28021